

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ALA MOHAMMAD,)	07 C 6587
Plaintiff,)	
)	Judge Manning
v.)	
)	Magistrate Judge Cole
CITY OF CHICAGO,)	
)	
Defendant.)	

**DEFENDANT’S UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO
ANSWER OR OTHERWISE PLEAD TO PLAINTIFF’S AMENDED COMPLAINT**

Defendant City of Chicago (the “City”), by Mara S. Georges, Corporation Counsel for the City of Chicago, respectfully requests that this Court grant it an extension of time of thirty (30) days, up to and including April 21, 2008, in which to answer or otherwise plead to plaintiff’s amended complaint. In support of this motion, the City states as follows:

1. On November 21, 2007, plaintiff filed a complaint against the Chicago Police Department pursuant to Title VII of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000e *et seq.*, and 42 U.S.C. § 1981, alleging discrimination claims on the basis of religion, national origin and ancestry, and a retaliation claim. On January 17, 2007, plaintiff executed a waiver of service request to the City, making the City’s answer or other pleading due on March 17, 2007. The City waived service on February 20, 2008.

2. On February 26, 2008, plaintiff moved for leave to amend his complaint to name the City as the defendant instead of the Chicago Police Department, which this Court granted. Plaintiff filed his amended complaint against the City on March 6, 2008 as a motion to amend/correct. The City’s answer or other pleading is currently due on March 20, 2007.

3. Because the undersigned counsel for the City was only recently assigned to this case, additional time is needed to prepare the City’s answer or other pleading. The City therefore requests a thirty (30) day extension, up to and including April 21, 2008, by which time it should be able to investigate plaintiff’s allegations and respond to the amended complaint.

4. This motion is the City's first request for an extension of time to answer or otherwise plead. Such a request will not unduly delay the resolution of the disputed issues, nor will it prejudice the plaintiff.

5. Plaintiff's counsel does not oppose this motion.

WHEREFORE, the City respectfully requests that this Court grant it an additional thirty (30) days, up to and including April 21, 2008, in which to answer or otherwise plead to plaintiff's complaint.

Dated: March 17, 2008

Respectfully submitted,

MARA S. GEORGES
Corporation Counsel for the City of Chicago

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